

Bear Wilner-Nugent, OSB #044549
Bear Wilner-Nugent, Counselor and Attorney at Law LLC
620 SW 5th Avenue, Suite 1008
Portland, Oregon 97204
(503) 351-2327
Fax (503) 914-6665
bwnlaw@gmail.com
Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

MICHAEL G. SCHWERN,

Plaintiff,

v.

NÓIRÍN PLUNKETT,

Defendant.

Case No. 3:14-CV-00146-PK

**PLAINTIFF'S MOTION FOR
EXTENSION OF TIME TO
RESPOND TO DEFENDANT'S
SPECIAL MOTION TO STRIKE**

Pursuant to Fed. R. Civ. P. 6(b) and LR 16-3, plaintiff respectfully moves the Court for an order extending the time for plaintiff to respond to defendant's special motion to strike by 14 days, to March 20, 2014. This motion is supported by the contemporaneously filed declaration of Bear Wilner-Nugent. Plaintiff's counsel has conferred with defense counsel, who states that defendant opposes this motion.

RESPECTFULLY SUBMITTED March 4, 2014,

/s/ Bear Wilner-Nugent
Bear Wilner-Nugent, OSB #044549
Attorney for Plaintiff